

EXHIBIT 3

UNITED STATES DISTRICT COURT
IN THE WESTERN DISTRICT OF MICHIGAN

BRUCE CRAIGIE and
BARBARA CRAIGIE,

Plaintiffs,

v.

NATIONSTAR MORTGAGE, LLC, a limited
liability company, and JOHN DOES 1-5,
unnamed individuals,

Defendants.

Case No. 1:15-cv-441

Judge Janet T. Neff

Theodore J. Westbrook (P70834)
Amanda P. Narvaes (P74957)
DREW, COOPER & ANDING, P.C.
Attorneys for Plaintiffs
Aldrich Place, Suite 200
80 Ottawa Avenue, N.W.
Grand Rapids, MI 49503
(616) 454-8300

Elisa J. Lintemuth (P74498)
Dykema Gossett PLLC
Attorney for Nationstar Mortgage LLC
300 Ottawa Avenue, N.W., Suite 700
Grand Rapids, MI 49503-2306
(616) 776-7500
elintemuth@dykema.com

**NATIONSTAR MORTGAGE LLC'S INITIAL DISCLOSURES PURSUANT TO
FED. R. CIV. P. 26(A)(1)**

Defendant Nationstar Mortgage LLC ("Nationstar"), through counsel, submits the following initial disclosures. These disclosures are based on information reasonably available to Nationstar at this time. Nationstar reserves the right to supplement these disclosures based on information acquired in the course of this lawsuit through discovery or factual investigation.

I. DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)(i) (Witnesses)

Nationstar identifies the following individuals, who are likely to have discoverable information that Nationstar may use to support its claims or defenses:

a. Past/present employees, personnel, representatives, and/or record custodians of Nationstar, who may be reached through counsel. Nationstar's representatives may have

knowledge of matters related to the Loans, the servicing of the Loans, Plaintiffs' defaults, the foreclosures, and other matters and communications alleged in Plaintiffs' Amended Complaint.

b. Past/present employees, personnel, representatives, and/or record custodians of First Tennessee Bank National Association, successor in interest by merger to First Horizon Home Loan Corporation, who may be reached through counsel. First Tennessee's representative may have knowledge of matters related to the origination and servicing of the Loans, Plaintiffs' defaults, and other matters and communications alleged in Plaintiffs' Amended Complaint.

c. Past/present employees, personnel, representatives, and/or record custodians of Transnation Title Agency of Michigan. Transnation Title's representative may have knowledge of matters related to the origination and closings of the Loans, and other matters and communications alleged in Plaintiffs' Amended Complaint.

d. Past/present employees, personnel, representatives, and/or record custodians of Trott Law P.C., 4024 Park East Court, Suite B, Grand Rapids, MI 49546 or other foreclosure counsel. These individuals may have knowledge concerning the subject foreclosure(s) and all related issues. By listing foreclosure counsel as persons with potential information, Nationstar does not waive the attorney-client, work-product, or investigator privileges.

e. Past/present employees, personnel, representatives, and/or record custodians of Schneiderman & Sherman, P.C. 23938 Research Dr., Suite 300, Farmington Hills, MI or other foreclosure counsel. These individuals may have knowledge concerning the subject foreclosure(s) and all related issues. By listing foreclosure counsel as persons with potential information, Nationstar does not waive the attorney-client, work-product, or investigator privileges.

f. Plaintiffs Bruce and Barbara Craigie, who may be contacted through counsel. Mr. and Mrs. Craigie may offer testimony concerning facts, documents, and events related to the Loans, the Properties, personal finances, the foreclosures, the defaults and other matters and communications alleged in Plaintiffs' Amended Complaint.

g. Past/present employees, personnel, representatives, and/or record custodians of the Kent County Register of Deeds, located at 300 Monroe Ave NW, Grand Rapids, MI 49503. These individuals may offer testimony concerning the authenticity of documents concerning the Lake Drive Loan, Lake Drive Property, and/or foreclosure.

h. Past/present employees, personnel, representatives, and/or record custodians of the Muskegon County Register of Deeds, located at 990 Terrace St., Muskegon, MI 49442. These individuals may offer testimony concerning the authenticity of documents concerning the Scenic Drive Loan, Scenic Drive Property, and/or foreclosure.

i. John D. Morris and Chelsie Morris, to be contacted through counsel, Jeshua T. Lauka, 99 Monroe Ave., N.W., Suite 1210, Grand Rapids, MI 49503. The Morrisses may offer testimony concerning facts, documents, and events related to the Scenic Drive Property, including the foreclosure.

j. Ryan Dykstra, to be contacted through counsel, William Franks, 1552 Lake Grove Ave SE, Grand Rapids, MI 49506-4739. Mr. Dykstra may offer testimony concerning facts, documents, and events related to the Lake Drive Property, including the foreclosure.

k. Any and all additional witnesses identified through the course of discovery.

l. Any non-objectionable witnesses identified by Plaintiffs.

**II. DISCLOSURE PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)(ii)
(Documents)**

Nationstar's evaluation of the documents and things that it may use in support of its

claims or defenses is continuing and ongoing. Accordingly, Nationstar reserves the right to supplement this disclosure. Nevertheless, Nationstar identifies the following documents in its possession and/or in the possession of its attorney that Nationstar may use to support its claims or defenses:

- a. The subject mortgages and notes.
- b. Public records relating to the subject mortgages, including but not limited to assignments of mortgage, sheriff's deeds, and other documents pertaining to the subject property.
- c. Records relating to servicing of the loans, including payment histories and non-privileged portions of any servicing notes.
- d. Non-privileged portions of the foreclosure file, including the sheriff's deed.
- e. Documents evidencing communications between the parties.
- f. Any and all documents identified by any other party.
- g. Any and all documents identified through discovery.

III. DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)(iii)
(Computation of Damages)

Not applicable.

IV. DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)(iv)
(Insurance Agreement)

Not applicable.

Dated: August 6, 2015

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: /s/ Elisa J. Lintemuth

Elisa J. Lintemuth (P74498)

Attorneys for Nationstar

300 Ottawa Avenue, N.W., Suite 700

Grand Rapids, MI 49503-2306

(616) 776-7500

elintemuth@dykema.com